

SBK:WMP  
F. #2009R0033

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 3,  
1001(a)(2) and 3551  
et seq.)

JOHN MARKOU,

Defendant.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE  
(Accessory To Robbery)

In or about and between May 2008 and April 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOHN MARKOU, together with others, knowing that an offense against the United States has been committed, specifically, the robbery of one or more employees of New York One, LLC, commonly known as "NY Pretzel," contrary to Title 18, United States Code, Section 1951(a), did knowingly and intentionally relieve, comfort and assist the offender, to wit: John Markou, Jr., in order to hinder and prevent his trial and punishment.

(Title 18, United States Code, Sections 3 and 3551 et seq.)

COUNT TWO  
(False Statement)

On or about March 11, 2009, within the Eastern District of New York, the defendant JOHN MARKOU did knowingly and intentionally make a materially false, fictitious and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, the Federal Bureau of Investigation ("FBI"), in that the defendant JOHN MARKOU stated to a Special Agent of the FBI that he loaned a friend approximately \$35,000 of the proceeds from the robbery referenced in Count One to use to open a new business, when, in fact, as he then and there well knew and believed, he had never loaned the money to this friend.

(Title 18, United States Code, Sections 1001(a)(2) and 3551 et seq.)

A TRUE BILL

  
FOREPERSON

\_\_\_\_\_  
BENTON J. CAMPBELL  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. 0.136

INFORMATION SHEET

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

1. Title of Case: **United States v. John Markou**
2. Related Magistrate Docket Number(s): 08 M 1158 (but complaint was dismissed)  
  
None ( )
3. Arrest Dates:
4. Nature of offense(s): ☒ Felony  
☐ Misdemeanor
5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3 of the Local E.D.N.Y. Division of Business Rules):  
**U.S. v. John Markou, Jr. et al., 08 CR 399 (S-2) (RJD)**
6. Projected Length of Trial: Less than 6 weeks (X)  
More than 6 weeks ( )
7. County in which crime was allegedly committed: Queens  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Has this indictment/information been ordered sealed? (X) Yes ( ) No
9. Have arrest warrants been ordered? (X) Yes ( ) No

BENTON J. CAMPBELL  
UNITED STATES ATTORNEY

By: Winston M. Paes  
Winston M. Paes  
Assistant United States Attorney  
718-254-6023